

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Strategic Pork Solutions, LLC.,

Case No. 24-31355
Chapter 11 Case, Subchapter V

Debtor.

**NOTICE OF HEARING AND MOTION FOR ALLOWANCE OF
COMPENSATION FOR TRUSTEE**

1. Mary F. Sieling, the Subchapter V trustee, moves the court for entry of an order approving her application for allowance of compensation.

2. The court will hold a hearing on this motion at **9:00 a.m. on Thursday, September 26, 2024** before the Honorable Chief Judge Katherine A. Constantine, in Courtroom 8 West, 300 South Fourth Street, Minneapolis, Minnesota 55415.

3. Any response to the relief requested herein must be filed and delivered not later than **Thursday, September 19, 2024**, which is seven days before the time set for the hearing (including Saturdays, Sundays, and holidays). **UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.**

4. This court has jurisdiction over this application under 28 U.S.C. §§ 157 and 1334, Fed. R. Bankr. P. 5005 and Local Rule 1070-1. This proceeding is a core proceeding. The petition commencing this case under chapter 11, subchapter V, was filed on May 23, 2024. The case is now pending in this court.

5. This application arises under 11 U.S.C. §§ 326 and 330. This application is filed under Fed. R. Bankr. P. 2016 and Local Rules 2016-1. This application was served in accordance with Local Rule 2002-1(b), upon all parties listed in the creditor matrix.

6. On May 24, 2024, the applicant was appointed as the subchapter V trustee in this case. A copy of the notice of appointment of the applicant is attached as Exhibit A.

7. The applicant has not made a prior request for compensation in this bankruptcy case. The court approved the trustee's request that the debtor pay a \$3,000.00 security deposit to the trustee [ECF No. 17], but the security deposit has not been paid.

8. A plan of reorganization has been filed but has not been confirmed.

9. To the best of the applicant's belief, there are other unpaid administrative expenses, including those owed to the debtor's bankruptcy attorney.

10. The applicant has not made an agreement and there is no understanding between the applicant and any other entity for the sharing of compensation to be received for services rendered in connection with this case or in connection with this application.

11. The applicant has performed actual and necessary services in the exercise and furtherance of her duties under the bankruptcy code. Attached as Exhibit B is a statement of fees incurred May 24, 2024 and August 31, 2024, and billed at an hourly rate of \$330.00. As required by Local Rule 2016-1, those statements contain an itemization of time separated by task or proceeding, (i) a description of the task or proceeding, (ii) a detailed list and description of each increment of time expended on the task or proceeding, and (iii) the name and capacity of the person who expended the time. The applicant expended a total of 12.5 hours for services rendered during the time described and requests allowance of compensation in the amount of \$4,125.00.

12. The following sets forth in narrative form the services that the applicant preformed in her capacity as Subchapter V trustee: The applicant analyzed multiple court pleadings including the schedules, the sale motion, the plan of reorganization and monthly operating reports. The applicant attended court proceedings as well as the initial debtor interview and meeting of creditors. The applicant analyzed the plan and had multiple communications with the debtor's attorney and other parties in interest related to issues in the case.

13. The following table summarizes the hours spent on each area of work:

Category	Billing Rate	Hours Billed	Billed Value
Analyzing pleadings, financials, operating reports and the plan.	\$330.00	2.5	\$825.00
Communications with interested parties re disputed issues, including the sale motion and the plan.	\$330.00	4.2	\$1,386.00
Attending court proceedings, the initial debtor interview and meeting of creditors.	\$330.00	4.3	\$1,419.00
Miscellaneous including drafting motion for security deposit and drafting monthly reports for UST	\$330.00	1.5	\$495.00
Total		12.5	\$4,125.00

14. All services for which compensation is requested were performed as the trustee.

15. The applicant seeks total compensation of \$4,125.00 for fees.

WHEREFORE, applicant requests the court enter an order:

1. Allowing applicant compensation in the amount of \$4,125.00 for fees.
2. Allowing the debtor to pay \$4,125.00 to the applicant as compensation for the period of May 24, 2024 through August 31, 2024.

Dated: September 4, 2024

By: s/ Mary F. Sieling
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